

Exhibit B

From: Miller, Britt M.
Sent: Friday, April 20, 2018 6:06 PM
To: Brian T. Ross; Wedgworth, Peggy
Cc: Aundrea K Gulley; Ho, Derek T.; Nemelka, Michael N.; Dorris, Daniel V.; Hafenbrack, Joshua; Jennifer L Gregor - Godfrey & Kahn (jgregor@gklaw.com); Rado, Andrei; McKenna, Elizabeth; Hughes, John; Ryan, Mark; Marovitz, Andrew S.; Provance, Matthew D.; Patrick, Kathy (EXTERNAL CONTACT); Brice Wilkinson; Ross MacDonald; Justin Patrick; Michael P. A. Cohen; Leo Caseria; Dylan Ballard; Amar Naik; Stetsko, Kathleen A. (Kate) (Perkins Coie); Mallary Maryland; Wendy D. Fuselier
Subject: RE: DMS - Document/Data production
Attachments: MDL 2817 - 4-20-18 Production Letter.pdf

Counsel –

Please see the attached correspondence regard CDK's reproduction of documents.

Regards – Britt

Britt M. Miller
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606-4637
Direct Dial: (312) 701-8663
Direct Fax: (312) 706-8763
e-mail: bmiller@mayerbrown.com

From: Brian T. Ross [mailto:bross@gibbsbruns.com]
Sent: Friday, April 20, 2018 12:37 PM
To: Wedgworth, Peggy
Cc: Miller, Britt M.; Aundrea K Gulley; Ho, Derek T.; Nemelka, Michael N.; Dorris, Daniel V.; Hafenbrack, Joshua; Jennifer L Gregor - Godfrey & Kahn (jgregor@gklaw.com); Rado, Andrei; McKenna, Elizabeth; Hughes, John; Ryan, Mark; Marovitz, Andrew S.; Provance, Matthew D.; Patrick, Kathy (EXTERNAL CONTACT); Brice Wilkinson; Ross MacDonald; Justin Patrick; Michael P. A. Cohen; Leo Caseria; Dylan Ballard; Amar Naik; Stetsko, Kathleen A. (Kate) (Perkins Coie); Mallary Maryland; Wendy D. Fuselier
Subject: Re: DMS - Document/Data production

Peggy—

Thank you, we will do so. On that note please see the attached cover letter, describing Reynolds's production that will be sent out today via Fedex.

Given that this is being sent out on a Friday, could someone from each of (i) Milberg, (ii) Kellogg, and (iii) Mayer Brown please let us know this afternoon your preference between (a) Saturday delivery; or (b) Monday delivery. That preference can be directed to me or our paralegal, Mallary Maryland (MMaryland@gibbsbruns.com).

Best regards,

Brian Ross

MAYER • BROWN

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April 20, 2018

By E-MAIL AND UPS

Peggy J. Wedgworth
MILBERG TADLER PHILLIPS GROSSMAN LLP
One Pennsylvania Plaza
New York, NY 10119

By E-MAIL

Derek T. Ho
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036

By E-MAIL

Brian T. Ross
GIBBS & BRUNS LLP
1100 Louisiana, Suite 5300
Houston, TX 77002

Re: *In re Dealer Management System Antitrust Litig.*,
MDL 2817, Case No. 18-CV-8645 (N.D. Ill.)

Counsel:

Per our discussion, we are sending out via UPS (for Monday delivery) four encrypted hard drives containing CDK Global, LLC's ("CDK") document production to date in *Authenticom, Inc. v. CDK Global, LLC and The Reynolds and Reynolds Company*, Case No. 17-CV-318 (W.D. Wisc.) / 18-CV-868 (N.D. Ill.). Per Ms. Wedgworth's request, the shipment is being directed to Joe Flowers at Milberg Tadler.

The documents in this production bear the Bates range CDK-0000001–CDK-2413156. A password needed to access the documents will be delivered separately via secure FTP (the password will be the same for each of the 4 drives). Certain of the documents in this production have been designated "Confidential" or "Highly Confidential" in accordance with the Protective Order entered in the *Authenticom* matter (Dkt. No. 85) and the Agreed Confidentiality Order in this MDL proceeding (Dkt. 104), and should be treated accordingly. CDK reserves the right to amend any confidentiality designation if it is later determined that certain documents do or do not qualify for protection under the Agreed Confidentiality Order. CDK's production of these documents is without waiver of any of CDK's previously asserted objections to Authenticom's discovery requests and/or any of its rights to assert objections to any additional discovery

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requests served in this MDL proceeding which may or may not seek discovery of documents included in this production.

By providing the indicated documents, CDK does not intend to waive, and is not waiving, its protections under the attorney-client privilege, the work product doctrine, or any other applicable privilege. Any disclosure of privileged or protected information is inadvertent and should not be deemed a waiver. In accordance with the Agreed Confidentiality Order, CDK requests that counsel promptly return or destroy any inadvertently disclosed privileged documents and all copies thereof.

Per Mr. Ho's request during our April 18 meet-and-confer, CDK agrees that this production shall be "deemed" served as of today's date, April 20, on counsel for *Cox Automotive, Loop, LLC*, and *MVSC* as well as counsel for The Reynolds and Reynolds Company, both of which have a current copy of CDK's production by virtue of their involvement in the *Authenticom* matter.

Please let us know if you have any difficulty accessing the documents.

Regards,



Britt M. Miller

cc: Mark Ryan
Matt Provance
Andi Gulley
Leo Caseria